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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 CHARLENE HULTMAN,) **NO. 4:24-CV-3381 JST**
13 Plaintiff,) [FILED JUNE 5, 2024]
14)
15 v.) **NOTICE OF RELATED CASE IN A**
16 KENNETH W. MATTSON, *et al.*,) **CRIMINAL ACTION**
17 Defendants.)
18 _____) **NO. 4:24-CV-4093 JST**
19 RICHARD ALLEN CLARIDGE, *et al.*,) [FILED JULY 8, 2024]
20 Plaintiffs,)
21 v.) **NOTICE OF RELATED CASE IN A**
22 TIMOTHY J. LEFEVER, *et al.*,) **CRIMINAL ACTION**
23 Defendants.)
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26)
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2 UNITED STATES OF AMERICA,) **NO. 3:25-CR-00126-CRB**
3 Plaintiff,) [FILED MAY 13, 2025]
4 v.)
5 KENNETH W. MATTSON,) **NOTICE OF RELATED CASE IN A**
6 Defendant.) **CRIMINAL ACTION**
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9 SECURITIES AND EXCHANGE) **NO. 3:25-CV-04387 JD**
10 COMMISSION,) [FILED MAY 22, 2025]
11 Plaintiff,) **NOTICE OF RELATED CASE IN A**
12 v.) **CRIMINAL ACTION**
13 KENNETH MATTSON,)
14 Defendant,)
15 and)
16 KS MATTSON PARTNERS LP,)
17 Relief Defendant.)
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1 Pursuant to Local Criminal Rule 8-1, the United States of America hereby notifies the Court that
 2 above-captioned civil and criminal cases are related.

3 *Hulton v. Mattson*, No. 4:24-cv-3381-JST, involves a “widowed senior citizen” who alleges that
 4 Kenneth W. Mattson (Mattson) committed federal securities fraud, elder abuse, and common law fraud
 5 in connection with investments Mattson solicited from her under the aegis of the firms LeFever Mattson,
 6 Divi Divi Tree, LP, and Specialty Properties Partners, LP. The case was initially assigned to Judge
 7 Breyer, who recused himself. The Clerk thereupon reassigned the matter to Judge Tigar. *See* Case No.
 8 4:24-cv-3381, ECF Nos. 12, 15. The Court dismissed the action as to certain defendants and has stayed
 9 it as to others that are in bankruptcy proceedings. *See id.* ECF Nos. 86, 87.

10 *Claridge v. LeFever*, No. 4:24-cv-4093-JST, is a putative class action complaint against Mattson,
 11 his business partner Timothy LeFever, and related entities. The complaint alleges that the case “arises
 12 from one of the largest investment frauds in recent history and seeks relief for hundreds of investors,
 13 many of whom entrusted their life’s savings and many of whom are elderly, who were harmed by the
 14 massive investment fraud perpetrated and enabled by Defendants.” *First Am. Class Action Complaint*,
 15 ECF No. 73 at 2, Case No. 4:24-cv-4093-JST (N.D. Cal. filed Jul. 8, 2024). The case is currently stayed
 16 pending bankruptcy proceedings. *See id.* at ECF Nos. 94, 95, 100.

17 *United States v. Mattson*, No. 25-cr-126 CRB, charges the defendant with seven counts of wire
 18 fraud in violation of 18 U.S.C. § 1343, one count of money laundering in violation of 18 U.S.C. § 1957,
 19 and one count of obstruction of justice in violation of 18 U.S.C. § 1519. *See* Indictment, ECF No. 1,
 20 Case No. 3:25-cv-126 CRB (N.D. Cal. filed May 13, 2025).

21 *Securities and Exchange Commission v. Mattson*, No. 3:25-cv-04387 JD, is a civil enforcement
 22 action against Mattson, and names KS Mattson Partners LP as a relief defendant. The complaint alleges
 23 that from approximately 2007 through April 2024, Mattson “orchestrated a Ponzi-like scheme that
 24 involved offering and selling fake interests in various legitimate limited partnerships created and
 25 managed by his company LeFever Mattson.” Complaint, ECF No. 1, Case No. 3:25-cv-04387 (N.D.
 26 Cal. Filed May 22, 2025).

1 Each of the cases described above revolves around allegations that Kenneth W. Mattson
2 defrauded investors with respect to investments he solicited in certain limited partnerships.

3 In light of the foregoing, each of the cases above are related within the meaning of Local Rule 8-
4 1(b)(1) because they involve the same defendant and the same events and occurrences. Furthermore, the
5 cases are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the
6 actions likely would involve substantial duplication of labor by the two judges. For example, in
7 *Hultman*, Judge Tigar has considered and ruled on, among other disputes, a motion for preliminary
8 relief, an administrative motion to relate the case with *Hultman*, and a motion to dismiss. In *Claridge*,
9 the various defendants have filed two separate motions to dismiss, though the case was stayed before the
10 Court could rule on either.

11 Pursuant to Local Criminal Rule 8-1(c)(4), it is the position of the United States that assignment
12 of these cases to a single judge is likely to conserve judicial resources and promote an efficient
13 determination of each action.

14 DATED: May 22, 2025

Respectfully submitted,

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16 PATRICK D. ROBBINS
Acting United States Attorney

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